

# BRE Client Report

## Review of daylight, sunlight and overshadowing, Enterprise Point and 16-18 Melbourne Street, Brighton

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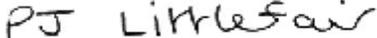
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## Executive Summary

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A planning application, BH2018/02751, has been submitted to Brighton and Hove City Council for a proposal to develop a site at Enterprise Point and 16-18 Melbourne Street, Brighton. The application is accompanied by a daylight and sunlight report by GIA 'Daylight and sunlight impact on neighbouring properties and internal amenity' dated 28<sup>th</sup> January 2019.

BRE have been commissioned by Brighton and Hove City Council to evaluate this report. The evaluation was to review the scope and methodology, text and conclusions of the report, but not verification of the calculations. This report gives the results of the evaluation.

East facing windows at Viaduct Lofts would be affected. GIA should remodel the taller block of flats there as some of the room layouts are incorrect on the upper floors, and they have omitted to model balconies (the BRE Report does recommend modelling without balconies, but as an additional study, not an alternative). However there is likely to be a major adverse impact on daylight to some of the flats, at least on the ground and first floors. There would also be significant losses of sunlight, even without the effect of the balconies, to the patio doors at the north eastern corner of the building on all floors up to the sixth floor. As GIA state, this is partly because of the effect of the projection immediately to the south of these windows.

The three storey element of Viaduct Lofts to the south would be less affected. There would be a significant loss of daylight to two small kitchens at ground floor level; this would count as a minor adverse impact.

Loss of daylight and sunlight to all other dwellings analysed in Melbourne Street would be within the BRE guidelines and classed as negligible. Two consented dwellings (reference BH2018/01855) between 32A Melbourne Street and Viaduct Lofts could be analysed; it is possible, though unlikely, that they might have a loss of daylight outside the BRE guidelines.

Windows on the west side of the flats at 29 Shanklin Road would lose light as a result of the new development. Daylight impacts would range from minor to major adverse. The worst affected windows would be in two studio flats on the ground floor and a living room on the first floor at the southern end, closest to the current Enterprise Point. 29 Shanklin Road could be viewed as a bad neighbour as it has windows directly on the site boundary, and therefore a loss of light outside the guidelines could be expected; and the affected rooms in 29 Shanklin Road have unusually large windows. However there is a very tall and dense belt of trees to the north which already restricts the light entering these windows.

Other dwellings at 7-27 Shanklin Road would be less affected. There could be a minor adverse impact on daylight distribution outside the guidelines for two rooms in numbers 15 and 25, if the room layouts used are correct. There would be a minor to moderate adverse impact on daylight to number 27, depending on the types of rooms lit by the affected windows.

Loss of sunlight is not an issue to dwellings in Shanklin Road as the relevant windows face north of due west.

At Gladstone Court and at St Martin's School there would be a small number of isolated minor adverse impacts to daylight alone; loss of sunlight would not be significant as the new development would lie to the north.

Daylight provision to the new development itself would be poor overall. Out of the 187 living rooms and studios analysed, 53 (28%) would not meet the British Standard 1.5% minimum recommended average



daylight factor (ADF) for a living room. 52 would not meet the recommended 2% ADF for a kitchen, but would meet the recommended 1.5% for a living room. Only 82 (44%) would meet both recommendations. This latter figure is likely to be an overestimate, as GIA appear not to have modelled the dense belt of trees to the north of the site.

Sunlight provision to the new development would be average, with around half of the rooms facing northerly and receiving limited sun.

The impact on sunlight to St Martin's School playground has not been formally analysed, but is unlikely to be significant as most of the development lies to the north. However there are small gardens to the rear of 13-27 Shanklin Road which could be affected by the proposed development; sunlight to these gardens should be analysed.

No sunlight analysis has been carried out for proposed open spaces forming part of the new development. However the only relevant low level spaces are the seating areas at ground and first floor level inside the courtyard, which is open to the south and therefore likely to receive enough sunlight.



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## 1 Introduction

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- 1.1.1 A planning application, BH2018/02751, has been submitted to Brighton and Hove City Council for a proposal to develop a site at Enterprise Point and 16-18 Melbourne Street, Brighton. The application is accompanied by a daylight and sunlight report by GIA 'Daylight and sunlight impact on neighbouring properties and internal amenity' dated 28<sup>th</sup> January 2019.
- 1.1.2 BRE have been commissioned by Brighton and Hove City Council to evaluate this report. The evaluation was to review the scope and methodology, text and conclusions of the report, but not verification of the calculations. This report gives the results of the evaluation.
- 1.1.3 The evaluation is based on plans of the development by Architecture PLB, including existing site location plan 2717\_GAD\_100000\_C dated 31/08/18, proposed block plan 2717\_GAD\_100001\_C dated 25/1/19, proposed first floor plan 2717\_GAD\_120001\_S dated 25/1/19, and proposed elevations 2717\_GAD\_141010-3\_E, also dated 25/1/19. A site visit was carried out on 11 February 2019. During the site visit access was available to the upper flat at 15 Shanklin Road and the lowest floor at 13 Shanklin Road.



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## 2 Evaluation criteria

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### 2.1 General approach

- 2.1.1 The GIA report has evaluated loss of daylight and sunlight to existing properties using the BRE Report BR 209, Site Layout Planning for Daylight and Sunlight, a guide to good practice. They have assessed daylight and sunlight provision to new buildings, using the BRE Report in conjunction with BS 8206 Lighting for Buildings Part 2, Code of Practice for Daylighting. These sources are appropriate and both are widely used by local authorities to help determine planning applications.
- 2.1.2 GIA state at least three times that the BRE guidelines are 'predicated on a suburban environment'. They even include a picture purporting to show such an environment, which is not in the BRE guide. The BRE guidelines are not based upon any particular type of environment, but on national and international guidelines for daylight and sunlight provision.
- 2.1.3 It is correct to say that the guidelines should be applied flexibly. However GIA's statement that 'In our experience it is possible for a development to meet the BRE Guidelines, without meeting the published targets' is self-contradictory.

### 2.2 Loss of daylight and sunlight – application of BRE guidelines

- 2.2.1 To assess the impact on the amount of diffuse daylighting entering existing buildings, the BRE Report uses the vertical sky component (VSC) on the window wall. This is one of the quantities calculated in the GIA report.
- 2.2.2 The BRE Report sets out two guidelines for vertical sky component:
  - 1. If the vertical sky component at the centre of the existing window exceeds 27% with the new development in place, then enough sky light should still be reaching the existing window.
  - 2. If the vertical sky component with the new development is both less than 27% and less than 0.8 times its former value, then the area lit by the window is likely to appear more gloomy, and electric lighting will be needed for more of the time.
- 2.2.3 Appendix 4 to the GIA report gives tables of vertical sky component 'before' and 'after' for all the affected windows.
- 2.2.4 The BRE Report also gives guidance on the distribution of light in the existing buildings, based on the areas of the working plane which can receive direct skylight before and after. If this area is reduced to less than 0.8 times its value before, then the distribution of light in the room is likely to be adversely affected, and more of the room will appear poorly lit. This guideline has also been addressed in the GIA report. The areas receiving direct skylight will depend on room layout, and the BRE report does state that where room layouts are not known, which may be the case for some of the surrounding properties, the calculation cannot be carried out. GIA have given results for the existing dwellings analysed. Where these are based on assumed room layouts, the results may be unreliable.
- 2.2.5 The BRE Report recommends that in existing buildings sunlight should be checked for all main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due



south. Access to sunlight should be calculated for the main window of each of the above rooms which faces within 90° of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above, less than 0.8 times their former value, and more than 4% lower than previously, then the sunlighting of the existing dwelling may be adversely affected. This guideline is also used in the GIA report.

### 2.3 Daylight and sunlight in new dwellings

- 2.3.1 Daylight and sunlight provision to the proposed rooms have been evaluated in the GIA report using the recommendations in the British Standard BS8206-2:2008 'Code of Practice for Daylighting'. The Standard contains guidance on daylight and sunlight for new dwellings, including recommended minimum values for Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH).
- 2.3.2 For daylight in new dwellings, the main criterion is the average daylight factor (ADF) which is a measure of the amount of daylight within a room. The ADF depends on the room and window dimensions, the reflectances of interior surfaces and the type of glass, as well as the obstructions outside. Appendix F of the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' explains that 'it is an appropriate measure to use in new buildings because most of these factors are within the developer's control'. GIA have calculated the average daylight factors for some of the proposed rooms.
- 2.3.3 The British Standard recommends the following minimum values for ADF:
- |              |      |
|--------------|------|
| Bedrooms     | 1.0% |
| Living rooms | 1.5% |
| Kitchens     | 2.0% |
- 2.3.4 These are minimum values. The Standard states that if a space has an ADF of 5% it will not normally need supplementary electric lighting provided the uniformity is satisfactory, and that a space with an ADF of 2-5% will normally need supplementary electric lighting.
- 2.3.5 Where a room has a shared use, the British Standard states that the higher minimum value should apply. However, local authorities frequently accept the living room standard for a shared kitchen/living room, as a small kitchen would not be considered as a habitable room. This is a practical approach, as it is seldom in the final resident's interest to have a closed off, small kitchen which is completely artificially lit in order to force compliance with the Standard for the living room. In this case an average daylight factor of 1.5% or more might be acceptable.
- 2.3.6 GIA have stated some of the assumptions they used to predict ADF, but not all of them. They assumed a glass transmittance of 0.68. They assumed an average room reflectance of 0.62 which is higher than the default value of 0.5, but could be achievable if light coloured room surfaces are definitely to be specified. They did not mention a maintenance factor, or a factor to correct for low level glazing.
- 2.3.7 The British Standard and BRE Report also give guidance on sunlight in new dwellings. This is based on living rooms receiving 25% of annual probable sunlight hours, including 5% in the



winter. GIA have calculated the annual probable sunlight hours for a sample of rooms in the new flats.

## 2.4 Impact assessment

2.4.1 The BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' (Appendix I) also gives guidance on assessing the impact of a proposed development. Where the loss of skylight or sunlight fully meets the guidelines in the document, the impact is assessed as negligible or minor adverse. Where the loss of light is well within the guidelines, or only a small number of windows or limited area of open space lose light (within the guidelines), a classification of negligible impact is more appropriate. Where the loss of light is only just within the guidelines, and a larger number of windows or open space area are affected, a minor adverse impact would be more appropriate, especially if there is a particularly strong requirement for daylight and sunlight in the affected building or open space.

2.4.2 Where the loss of skylight or sunlight does not meet the guidelines in the BRE Report, the impact is assessed as minor, moderate or major adverse. Factors tending towards a minor adverse impact include:

- only a small number of windows or limited area of open space are affected
- the loss of light is only marginally outside the guidelines
- an affected room has other sources of skylight or sunlight
- the affected building or open space only has a low level requirement for skylight or sunlight
- there are particular reasons why an alternative, less stringent, guideline should be applied.

2.4.3 Factors tending towards a major adverse impact include:

- a large number of windows or large area of open space are affected
- the loss of light is substantially outside the guidelines
- all the windows in a particular property are affected
- the affected indoor or outdoor spaces have a particularly strong requirement for skylight or sunlight, for example a living room in a dwelling or a children's playground.

### 3 Loss of daylight and sunlight to existing dwellings

#### 3.1 The site and surrounding areas

3.1.1 Figure 1, taken from GIA's report, shows the new development and surrounding areas.

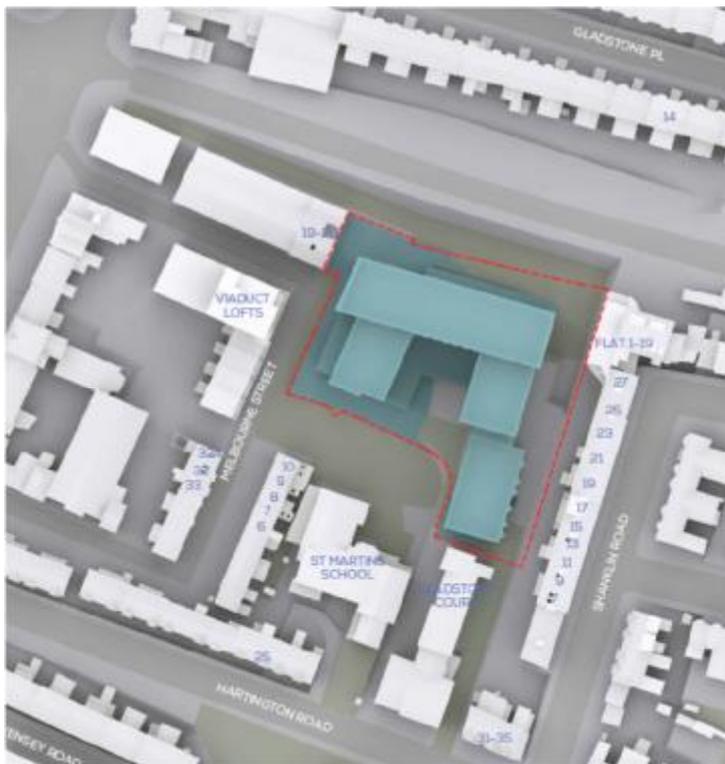


Figure 1. Plan by GIA showing the new development and the nearest surrounding buildings. North is at the top of the plan.

- 3.1.2 The site currently has a sizeable office block (currently used mainly for residential accommodation) and a low rise building on it. To the south is St Martin's School and Gladstone Court. To the west is Melbourne Street, with houses and flats opposite. To the north is a belt of trees and a road leading to Lewes Road cemetery. To the east is Shanklin Road.
- 3.1.3 The site slopes significantly from west up to east, so that the eastern boundary of the site is significantly higher, around 7-8m higher, than Melbourne Street to the west. Shanklin Road itself is even higher. GIA's model appears to have taken into account this difference in height.
- 3.1.4 GIA have analysed the nearest existing dwellings, in Melbourne Street (including Viaduct Lofts), Gladstone Court and Shanklin Road. They have also analysed St Martin's School. These are discussed below.
- 3.1.5 Planning permission (reference BH2018/01855) has recently been granted for two dwellings on Melbourne Street, between 32A Melbourne Street and Viaduct Lofts. Loss of light could have been analysed to these two proposed dwellings.



- 3.1.6 There appear to be no other dwellings that could be significantly affected. Dwellings in Gladstone Place and Hartington Road are too far away to be significantly impacted. The other nearby buildings are commercial and industrial in nature, for which daylight and sunlight could be seen as less important.

### 3.2 Viaduct Lofts

- 3.2.1 This is a relatively recent development (Figure 2) opposite the proposed development, facing it across Melbourne Street. It includes a three storey element, to the left and middle of Figure 2, and a seven storey block of flats, to the right.



Figure 2. Viaduct Lofts, taken from the proposal site.

- 3.2.2 The three storey element would be less affected as it would retain daylight and sunlight coming from over the school playground. There would be a significant loss of daylight to two small kitchens at ground floor level; this would count as a minor adverse impact.
- 3.2.3 The taller block of flats facing towards the new development would be more substantially affected as it would be directly opposite them. There are two issues with GIA's modelling of these flats. First, the room layouts for the upper floors are incorrect. GIA have modelled the leftmost (southernmost) window (the large patio door facing onto the balcony) as lighting a bedroom, and the next two, smaller, windows as lighting a single living room. This is correct on the ground floor, but on the first floor and above the patio doors actually light a living room and the two windows light two bedrooms. This is evident from the approved plans for Viaduct Lofts (BH2009/00655) and from observations from street level. It means that the room designations in GIA's tables and their daylight distribution figures are incorrect, and sunlight figures have not been given for these living rooms at first floor level and above. The layout for the end flat (at the far right of Figure 2) appears correct.
- 3.2.4 Secondly, GIA have not modelled the balconies above the windows. Balconies do block light from the upper parts of the sky, and windows with balconies above them can have large relative losses of light even with a modest obstruction. For this reason the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' suggests an additional calculation without the balconies in place. However it makes it clear that this should be an extra calculation, but not an alternative. The standard practice is to provide the data with and without balconies.



- 3.2.5 Accordingly it is recommended that GIA provide a new set of data for these flats with the correct room layouts, and with and without the balconies in place.
- 3.2.6 Based on the data that have been provided, the four windows on the ground floor facing towards the new development would all have big losses of light, even without the additional effect of the balconies above. On the first, second and third floors, the southernmost (leftmost in Figure 2) patio doors, and the bedrooms to the right of them, would have a loss of vertical sky component outside the BRE guidelines even without the balcony in place.
- 3.2.7 The worst affected windows would be the patio doors at the north eastern corner of the building, at the far right in Figure 2. On the ground to fifth floors there would be a significant loss of vertical sky component to these windows even without the balconies above. These rooms do have another window facing north which would be less affected, but it is a small secondary window.
- 3.2.8 Overall, the loss of daylight to these flats would provisionally be classified as a major adverse impact, at least on the ground and first floors. GIA justify the low levels of daylight with the new development in place by comparing the residual vertical sky components they calculated for Viaduct Lofts (in this part of the building, 9-18% at ground floor level, rising to 13-24% at second floor level) with examples for other parts of Brighton. However the living rooms will have much lower vertical sky components in practice, because of the effect of the balconies.
- 3.2.9 There would also be significant losses of sunlight, even without the effect of the balconies, to the patio doors at the north eastern corner of the building on all floors up to the sixth floor. As GIA state, this is partly because of the effect of the projection immediately to the south of these windows.

### 3.3 Other dwellings in Melbourne Street

- 3.3.1 Loss of daylight and sunlight to all other dwellings analysed in Melbourne Street would be within the BRE guidelines and classed as negligible. This includes numbers 6-10 and 32, 32A and 33.
- 3.3.2 As stated above, loss of light could be analysed to two proposed dwellings (reference BH2018/01855) on Melbourne Street, between 32A Melbourne Street and Viaduct Lofts. It is possible, though unlikely, that they might have a loss of daylight outside the BRE guidelines.

### 3.4 29 Shanklin Road

- 3.4.1 29 Shanklin Road is a block of flats immediately adjoining the proposal site. The internal layout of this building is uncertain; although historic plans were supplied by BHCC, they do not appear to correspond exactly with the actual layout of the building.
- 3.4.2 Windows on the west side of the building (Figure 3) would lose light as a result of the new development. The worst affected windows would be on the lower floors at the southern end of the façade, closest to the current Enterprise Point. These are to the lower right in Figure 3.



Figure 3. 29 Shanklin Road, viewed from Melbourne Street over the proposal site.

- 3.4.3 Loss of vertical sky component to fifteen different windows lighting thirteen different rooms would be outside the BRE guidelines. For the affected flats impacts would range from minor to major adverse. The major adverse impacts would apply to two studio flats on the ground floor and a living room on the first floor, at the bottom right corner of the façade as viewed in Figure 3. Their calculated vertical sky components would drop from 29-33% currently down to 16-19% with the new development in place.
- 3.4.4 GIA justify the low levels of daylight with the new development in place by comparing with examples for other parts of Brighton. It is true that the affected rooms in 29 Shanklin Road have unusually large windows and therefore could probably still have some daylit character with vertical sky components as low as 16-19%.
- 3.4.5 However there is another factor affecting the daylight to this façade. To the north is a very tall and dense belt of trees, visible to the left of Figure 3. Even in winter it was observed to attenuate daylight significantly, and in summer it would have a similar effect to a very tall wall. GIA do not appear to have included these trees in their calculations. For loss of light analysis, where one building is affecting others nearby, their methodology is appropriate, in accordance with the BRE guidelines, which state that in these situations loss of light due to trees should not be taken into account. Nevertheless, in practice it means that the daylight entering these windows will be further restricted by the trees, so that the effective vertical sky component in practice might be well under 16-19%.
- 3.4.6 GIA also correctly point out that 29 Shanklin Road could be viewed as a bad neighbour as it has windows directly on the site boundary, and therefore a loss of light outside the guidelines could be expected.
- 3.4.7 Loss of sunlight would not be an issue to these windows as they face north of due west. There are some windows further along, not visible in Figure 3, which do face south of due west, but any changes in sunlight would be well within the BRE guidelines.



### 3.5 7-27 Shanklin Road (odd numbers only)

- 3.5.1 This is a terrace of dwellings to the east of the proposal site. A number of them are divided into flats with the lowest storey being a garden flat and the upper floors another flat. Windows to the rear of the properties could be affected by the proposed development.
- 3.5.2 Loss of vertical sky component would be within the BRE guidelines for all the windows in numbers 7-25 inclusive. Some windows would have very small increases.
- 3.5.3 According to the calculations, there could be an impact on daylight distribution outside the guidelines for two rooms in numbers 15 and 25. There is uncertainty about this, because the actual room layouts are not known. If correct, it would be classified as a minor adverse impact.
- 3.5.4 For 27 Shanklin Road, there would be a loss of vertical sky component outside the guidelines to four windows on the lowest floor. Three of these light the same room, and a fourth (which is only marginally outside the guidelines) appears to be a secondary window to another room with a larger window meeting the guidelines. According to the calculations, there could be an impact on daylight distribution outside the guidelines for four rooms in total. The loss of daylight would be classified as minor to moderate adverse depending on room type.
- 3.5.5 Loss of sunlight would not be an issue for the rear windows of numbers 7-27, as they face north of due west.

### 3.6 Gladstone Court

- 3.6.1 Gladstone Court (Figure 4) is a block of flats to the south of the proposal site. Its main windows face west towards Melbourne Street and would not be significantly affected by the proposed development.



Figure 4. Gladstone Court, with St Martin's School behind it.

- 3.6.2 According to GIA, loss of vertical sky component to one window would be outside the BRE guidelines. This window is in the end elevation of the building, hidden behind the fence in Figure 4. However, according to GIA's plans, it is a secondary window; the main window to the room faces out of the back of the building. Loss of light to this main window would be within the BRE



guidelines. The impact on the room would be assessed as minor adverse, with a negligible impact elsewhere. Although windows to the side of the rear extension could lose light, they are understood to light circulation areas, and therefore the BRE guidelines would not apply.

- 3.6.3 Loss of sunlight is not an issue as the new development would lie to the north of Gladstone Court.

### 3.7 St Martin's School

- 3.7.1 St Martin's School lies to the south of the site, and is visible on the right hand side of Figure 4 above. Loss of daylight to all but two windows would be within the BRE guidelines. These windows are situated under a very deep overhang (this overhang is visible next to Gladstone Court in Figure 4), and currently receive very little direct light. Without the overhang, it is likely that they would comply with the guidelines too. Also, GIA appear to have modelled the overhang as opaque whereas in reality it is probably translucent. A translucent overhang would result in a much lower proportion of light being lost. Accordingly any impact on these windows would be classified as negligible or minor adverse depending on room use.
- 3.7.2 According to GIA's figures, six rooms would have an impact on their daylight distribution outside the BRE guidelines. Two of these are behind the deep overhang described above, and for the other four the effect would be only just outside the guidelines. This would be a minor adverse impact.
- 3.7.3 Any loss of sunlight would be very small as the new development would lie to the north of St Martin's School.



## 4 Daylight and sunlight provision to the new development

### 4.1 Daylight

4.1.1 For daylight provision in new dwellings, the British Standard recommends the following minimum values for ADF:

Bedrooms	1.0%
Living rooms	1.5%
Kitchens	2.0%

4.1.2 Where a room has a shared use, the British Standard states that the higher minimum value should apply. Thus for a living/kitchen/diner (LKD) the recommendation would be 2%. However, local authorities frequently accept the living room standard (1.5%) for a shared kitchen/living room as a small kitchen would not be considered as a habitable room.

4.1.3 GIA have calculated average daylight factors in the new development. They have analysed a subset of the proposed rooms, which is a reasonable approach. The rooms analysed are reasonably representative of those in the development as a whole; they may lean towards a worse case because GIA have (rightly) analysed the rooms on the internal corners of blocks, which tend to be more heavily obstructed.

4.1.4 Overall, daylight provision is poor. Out of the 187 living rooms and studios analysed, 53 (28%) would not meet the recommended 1.5% minimum ADF for a living room; four of these are residential living/kitchen/diners (LKDs), and the remainder are studios. 57 would not meet the recommended 2% ADF for a kitchen, but would meet the recommended 1.5% for a living room; this includes two of the 16 residential LKDs. Only 77 (41%) of the living rooms and studios would meet both recommendations. Contrary to GIA's commentary, this is a low level of compliance.

4.1.5 In addition, GIA appear not to have included the dense belt of trees to the north of the site (see Figure 3 above) in their model. This means that the rooms on the north elevation, for which GIA have calculated ADFs around 2% on the lower floors, are unlikely to achieve these values in practice.

### 4.2 Sunlight to rooms

4.2.1 Of the 97 living rooms and studios analysed for sunlight, 88 would meet the BS recommendations in full and another 3 would meet the annual target but not the winter one. However these figures only represent around half of the 187 such rooms analysed for daylight (the others face northerly and have not been analysed by GIA). Overall the sunlight compliance rate for the whole development is likely to be around 50%, which is average rather than good.

## 5 Sunlight to open spaces

- 5.1.1 Guidance on sunlight in outdoor spaces is given in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'. It gives a recommendation for outdoor spaces where sunlight is required.
- 5.1.2 The Report recommends that no more than half of such an area should be prevented by buildings from receiving two hours of sunlight on 21 March. Sunlight at an altitude of 10 degrees or less does not count.
- 5.1.3 GIA have considered the potential loss of sunlight to St Martin's School playground although they have not carried out a formal assessment. Most of the new development would lie to the north of the playground and be unlikely to impact sunlight to it. There is an element to the east which could obstruct sunlight in the early morning, but this is unlikely to affect the operation of the playground at break times and lunchtime. Accordingly, we agree that the impact on sunlight to the playground is unlikely to be significant.
- 5.1.4 However there are small gardens to the rear of 13-27 Shanklin Road which could be affected by the proposed development as part of it would lie to the south west. Figure 5 shows some of them.



Figure 5. Gardens at 17-27 Shanklin Road, taken from the terrace of number 15.

- 5.1.5 The gardens vary in size and have fences around them which limit the sunlight they currently receive. However, a study of the loss of sunlight to these areas should be carried out.



- 5.1.6 No sunlight analysis has been carried out for proposed open spaces forming part of the new development. However the only relevant low level spaces are the seating areas at ground and first floor level inside the courtyard, which is open to the south and therefore likely to receive enough sunlight.



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## 6 Conclusions

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- 6.1.1 This report has analysed the daylight and sunlight report by GIA 'Daylight and sunlight impact on neighbouring properties and internal amenity', dated 28<sup>th</sup> January 2019, for a development at Enterprise Point and 16-18 Melbourne Street, Brighton. The assessment has been carried out against the guidelines in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'.
- 6.1.2 East facing windows at Viaduct Lofts would be affected. GIA should remodel the taller block of flats there as some of the room layouts are incorrect on the upper floors, and they have omitted to model balconies (the BRE Report does recommend modelling without balconies, but as an additional study, not an alternative). However there is likely to be a major adverse impact on daylight to some of the flats, at least on the ground and first floors. There would also be significant losses of sunlight, even without the effect of the balconies, to the patio doors at the north eastern corner of the building on all floors up to the sixth floor. As GIA state, this is partly because of the effect of the projection immediately to the south of these windows.
- 6.1.3 The three storey element of Viaduct Lofts to the south would be less affected. There would be a significant loss of daylight to two small kitchens at ground floor level; this would count as a minor adverse impact.
- 6.1.4 Loss of daylight and sunlight to all other dwellings analysed in Melbourne Street would be within the BRE guidelines and classed as negligible. Two consented dwellings (reference BH2018/01855) between 32A Melbourne Street and Viaduct Lofts could be analysed; it is possible, though unlikely, that they might have a loss of daylight outside the BRE guidelines.
- 6.1.5 Windows on the west side of the flats at 29 Shanklin Road would lose light as a result of the new development. Daylight impacts would range from minor to major adverse. The worst affected windows would be in two studio flats on the ground floor and a living room on the first floor at the southern end, closest to the current Enterprise Point. 29 Shanklin Road could be viewed as a bad neighbour as it has windows directly on the site boundary, and therefore a loss of light outside the guidelines could be expected; and the affected rooms in 29 Shanklin Road have unusually large windows. However there is a very tall and dense belt of trees to the north which already restricts the light entering these windows.
- 6.1.6 Other dwellings at 7-27 Shanklin Road would be less affected. There could be a minor adverse impact on daylight distribution outside the guidelines for two rooms in numbers 15 and 25, if the room layouts used are correct. There would be a minor to moderate adverse impact on daylight to number 27, depending on the types of rooms lit by the affected windows.
- 6.1.7 Loss of sunlight is not an issue to dwellings in Shanklin Road as the relevant windows face north of due west.
- 6.1.8 At Gladstone Court and St Martin's School there would be a small number of isolated minor adverse impacts to daylight alone; loss of sunlight would not be significant as the new development would lie to the north.
- 6.1.9 Daylight provision to the new development itself would be poor overall. Out of the 187 living rooms and studios analysed, 53 (28%) would not meet the recommended 1.5% minimum ADF for a living room. 52 would not meet the recommended 2% ADF for a kitchen, but would meet the



recommended 1.5% for a living room. Only 82 (44%) would meet both recommendations. This latter figure is likely to be an overestimate as GIA appear not to have modelled the dense belt of trees to the north of the site.

- 6.1.10 Sunlight provision would be average, with around half of the rooms in the development facing northerly and receiving limited sun.
- 6.1.11 The impact on sunlight to St Martin's School playground has not been formally analysed but is unlikely to be significant as most of the development lies to the north. However there are small gardens to the rear of 13-27 Shanklin Road which could be affected by the proposed development; sunlight to these gardens should be analysed.
- 6.1.12 No sunlight analysis has been carried out for proposed open spaces forming part of the new development. No sunlight analysis has been carried out for proposed open spaces forming part of the new development. However the only relevant low level spaces are the seating areas at ground and first floor level inside the courtyard, which is open to the south and therefore likely to receive enough sunlight.